

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al.,
Plaintiffs,
v.
STANLEY TAYLOR, et al.,
Defendants.

C.A. No. 05-823-***
JURY TRIAL REQUESTED

PLAINTIFF GEORGE A. JACKSON'S WRITTEN DEPOSITIONS
TO DEPOSE DEFENDANT MICHAEL KNIGHT

Plaintiff George A. Jackson, pro se, hereby depose defendant upon
Order of the Court:

GENERAL OBJECTIONS

1. Plaintiff objects to the deposing of the defendants to the
extent of written depositions. Just for the record.

WRITTEN DEPOSITIONS

1. How long have you been employed with the Delaware Department of Corrections?
2. Are you under the influence of any medication?
3. Have you had a chance to review the Amended Complaint, your "Respose to the Plaintiffs' Interrogatories, and any previous statements you given to defendants' counsel or any one else in connection with this case before coming here today?
4. Have you had a chance to meet and discuss the case with defendants' counsel?
5. Do you realize that you are under oath, just as if you were at trial testifying?
6. Is there any reason you can't give your best testimony today?
7. State your job title, and explain your general duties.



8. Prior to December 1, 2005, has the S.C.I. main kitchen ever received any Certificate of Inspection from the Occupational Safety and Health Administration (OSHA). If yes, state the date/year.

9. In your "Response no. 2 to Plaintiffs' Interrogatories," you alleged "periodic prevention maintenance records were also discussed and reviewed to make sure everything is up to date." Name those persons, including yourself, who discussed and reviewed those records.

10. Does your office maintained certification records of S.C.I. food service inspection, containing the name of the person who performed the inspection and serial number, or other identifier of the kitchen equipment?

11. In your "Response no. 4 to Plaintiffs' Interrogatories," you alleged "... professional steam cleaning vendor **Going Clean** steam cleans the system." Did "Going Clean" ever steam clean the S.C.I. main kitchen prior to August 9, 2005?

12. How often in one (1) year do you personally inspect the S.C.I. main kitchen? When was your last day/date at the S.C.I. main kitchen,

13. Have you ever recorded the air temperature on the "old" side of kitchen, ~~and compared to the "new" side area of the S.C.I. kitchen during the summer months?~~ If yes, what was the results?

14. Have you personally instructed or order S.C.I food service employees not to allow inmate kitchen workers to not be allowed to wear DOC issue hats and jackets during extreme cold winter days in the S.C.I main kitchen.

15. During the summer when temperatures rise and/or exceed 100 degrees. Inmate kitchen workers are provided with regular breaks and encouraged to drink plenty of liquids on these hot days. Are you aware there is only one (1) toilet seat for 22 to 25 inmates use ~~while at work at the S.C.I main kitchen.~~